



Gmail

David Rubenstein <drubenstein@rubensteinbusinesslaw.com>

Kintetsu World Express v. Dialectic Distribution | 1:21-cv-09579-JHR | KLSE File: 6405

Charles Schmidt <cschmidt@klselaw.com>
To: "David Rubenstein Esq." <drubenstein@rubensteinbusinesslaw.com>

Tue, Jan 30, 2024 at 3:55 PM

Dear David,

Please find attached various discovery demands.

You have identified several persons whose depositions you would like to take. I have previously advised you about the availability of RA Dr. Lothar Harings and RA Max Jürgens.

The others are the following, with comments about their availability for deposition by remote means pursuant to mere notice but subject to agreement on mutually acceptable dates and times:

Olaf Gerber – no longer employed by KWE Deutschland and not in control of KWE USA

Stijn Buggenhout – still employed by KWE Benelux and willing to appear by remote means

Tetsuhiro Matsuno – still employed and willing to appear by remote means

Rocky Zhou – believed to still be employed by KWE Hong Kong; agreement to appear by remote means requested by not yet secured

David Qi – believed to still be employed by KWE Hong Kong; agreement to appear by remote means requested by not yet secured

Takashi Miyagi – still employed and willing to appear by remote means

Regards,
Charlie

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